

District Judge Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHERYL BISHOP,

Plaintiff,

v.

WILLIAM BARR, ACTING ATTORNEY
GENERAL, DEPARTMENT OF JUSTICE,
ALCOHOL, TOBACCO, FIREARMS &
EXPLOSIVES,

Defendant.

No. C18-00599-TSZ

DECLARATION OF JESSE WING IN
OPPOSITION TO DEFENDANT'S
MOTIONS IN LIMINE

Noted on Motion Calendar for:
Friday, October 11, 2019

I, Jesse Wing, declare as follows:

I am one of the attorneys for Plaintiff Cheryl Bishop. I am over the age of 18, and am competent to testify.

1. **Exhibit 1** is a true copy of an email chain dated April 6-7, 2016 between Cheryl Bishop, Ronald Turk, Michael Gleysteen, Roger Beasley, and James McDermond—in which Gleysteen takes charge of investigating K-9 issues at the request of Turk.

2. **Exhibit 2** is a true copy of excerpts of the deposition of Michael Gleysteen dated October 4, 2017.

3. **Exhibit 3** is a true copy of excerpts from the deposition transcript of Rule 30(b)(6) deposition of Raphael Martinez dated July 18, 2019.

4. **Exhibit 4** is a true copy of an email chain concluding with an email between Roger Beasley and Michael Gleysteen dated April 29, 2016, in which he confirms that that

DECLARATION OF JESSE WING IN OPPOSITION TO
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No. C18-00599-TSZ

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MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

1 Agent Bishop's TDY is finalized.

2 5. **Exhibit 5** is a true copy of an email chain concluding with an email from Cheryl
3 Bishop to Celinez Nunez dated April 22, 2016, in which she reports that AD Beasley would like
4 to offer her the TDY and that AD Gleysteen approved of Bishop bringing her K-9 on the TDY.

5 6. **Exhibit 6** is a true copy of an email chain concluding with emails between
6 Donald Robinson and John Ryan dated April 7, 2016 about a TDY for Agent Bishop.

7 7. **Exhibit 7** is a true copy of excerpts from the deposition transcript of Rule
8 30(b)(6) deposition of Celinez Nunez dated July 8, 2019.

9 8. **Exhibit 8** is a true copy of excerpts from the deposition transcript of Douglas
10 Dawson dated October 18, 2017.

11 9. **Exhibit 9** is a true copy of Complainant's Answers and Response to Agency's
12 Interrogatories, Request for Admissions, and Request for Production of Documents dated August
13 10, 2017.

14 10. **Exhibit 10** is excerpts of Defendant's Objections and Supplemental Responses to
15 Plaintiff Cheryl Bishop's Second Set of Discovery to Defendant.

16 11. **Exhibit 12** of Agent Bishop's Complaint of Workplace Harassment and Character
17 Defamation (dated May 3, 2016).

18 12. **Exhibit 13** is a true copy of Agent Bishop's Amended Affidavit from the EEOC
19 investigation into Agent Bishop's racial harassment complaint in 2016.

20 DATED this 7th day of October, 2019, at Seattle, Washington.

21
22 /s/Jesse Wing

23 Jesse Wing
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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled
**DECLARATION OF JESSE WING IN OPPOSITION TO DEFENDANT'S MOTIONS IN
LIMINE** with the Clerk of the Court using the CM/ECF system, which will send notification of
such filing to the following CM/ECF participant(s):

Priscilla T. Chan: Priscilla.Chan@usdoj.gov
Sarah K. Morehead: Sarah.Morehead@usdoj.gov

DATED this 7th day of October, 2019, at Seattle, Washington.

/s/Jesse Wing
Jesse Wing, WSBA #27751